

Testimony of Zachary Corrigan, Staff Attorney

Maryland Public Interest Research Group

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Good afternoon, my name is Zach Corrigan, staff attorney for the Maryland Public Interest Research Group. Thank you for allowing me to testify on environmental health issues affecting senior citizens. MaryPIRG is a statewide non profit, non partisan public interest advocacy organization.

Today, I would like to talk about the grave problem of air pollution and how it detrimentally impacts senior citizen health. In fact, the four most frequent causes of death in people age 65 and over are made worse by air pollution exposure. The best thing the EPA can do to prevent this is to reverse its course on several of its efforts to weaken clean air protections and devalue senior citizens' lives.

A growing percentage of the public is entering their golden years. Today, more than 35 million Americans are age 65 and over, a number that is expected to double by the year 2030, when more than 20 percent of the country's population will be in this age bracket. Improving the quality of life for senior citizens is therefore an important and increasingly high priority for our nation.

We have grave concerns about this administration's commitment to protecting the health of senior citizens. These concerns stem from White House and EPA actions that will, first, rollback clean air rules allowing more harmful pollution to be emitted into our skies, and, second, justifies these rollbacks by devaluing the value of senior citizen's life up to 63% of the value of a life of someone younger. The Administration uses this new math to justify weakening health protections to allow the coal, oil, electric, and paper industries emit more pollution.

Reducing air pollution, and particularly power-plant pollution, will improve and even extend senior citizens' lives. This is because senior citizens are especially vulnerable to health problems caused by air pollution. For the last two decades, heart disease, cancer, stroke and cardio obstructive pulmonary disease have been the top four leading causes of death for persons age 65 years and older. Each of these causes of premature death is worsened by air pollution.<sup>1</sup> For example, with heart disease, fine particulate air pollution can pass from the lungs into the bloodstream, affecting heart rate, causing arrhythmia and inflammation, and increase the risk of death from heart failure. Mercury, an air pollutant primarily emitted by power plants, has been linked to heart attacks.<sup>2</sup> Lung cancer also appears to be worsened by air pollution exposure.<sup>3</sup> In terms of stroke, rates of ischemic stroke deaths increase with increased concentrations of air pollutants including nitrogen dioxide and ozone.<sup>4</sup> In the Eastern United States, summer ozone pollution causes an estimated 159,000 emergency room visits per year for COPD and other respiratory emergencies.<sup>5</sup> Air pollution from power plants causes an estimated 927 deaths, 608 hospitalizations, and 947,000 restricted access days each year in Maryland and the brunt of this burden is borne by senior citizens.

Illnesses and deaths related to air pollution take a severe emotional and psychological toll on seniors and their loved ones. In addition, air pollution has a large economic toll. Today senior citizens spend roughly eleven percent of their total expenditures on health care, compared to about five percent for other consumers.<sup>6</sup> All told, heart disease, stroke and chronic lung diseases—conditions all made worse by

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<sup>1</sup> Centers for Disease Control and Prevention, National Center for Health Statistics, Trends in Health and Aging, Trends in Causes of Death Among the Elderly, March 2001.

<sup>2</sup> Committee on Toxicological Effects of Methylmercury, Toxicological Effects of Methylmercury, National Academy Press 2000. pp. 168-172 (available at [www.nap.edu](http://www.nap.edu)).

<sup>3</sup> Pope, C.A., Burnett, R.T., Thun, M.J., Calle, E.E., Krewski, D., Ito, K., and Thurston, G.D. Lung Cancer, Cardiopulmonary Mortality, and Long-term Exposure to Fine Particle Pollution, Journal of the American Medical Association, Vol. 287, No. 9, March 6, 2002.

<sup>4</sup> Hong, Y. C., Lee J.T., Him, H., Ha, E.H., Schwartz, J., and Christiani, D.C. Effects of Air Pollutants on Acute Stroke Mortality. Environ.Health Perspec. Vol 110, pp. 187-191, 2002.

<sup>5</sup> Abt Associates. Adverse Health Effects Associated with Ozone in the Eastern United States. October 1999.

<sup>6</sup> Administration on Aging, A Profile of Older Americans: 2001. Health, Health Care, and Disability. Found at [www.aoa.gov/aoa/STATS/profile/2001/12.html](http://www.aoa.gov/aoa/STATS/profile/2001/12.html).

air pollution— cost Americans nearly \$248 billion in direct medical costs in 2002, and resulted in another \$49 billion in lost productivity.<sup>7</sup>

Unfortunately, even while the summer smog “red alerts” warn the elderly to stay indoors, few policymakers are making the link between clean air, healthier seniors, and lower health-care costs for everyone.

Given the severe health consequences of air pollution for seniors, it is unjustifiable that the U.S. EPA is advancing policies that will result in increases in air pollution, and thus undermining senior citizens’ health. In December of last year, the EPA published a set of finalized and proposed weakening changes to the “New Source Review” program. Under these changes, 17,000 facilities, including refineries, chemical plants, pulp and paper mills, and power plants, will be able to increase air emissions without installing control technologies. Among others, your colleagues, the state and local air pollution control officials, criticize these changes, because they “will result in unchecked emission increases that will degrade air quality and endanger public health.”<sup>8</sup> Fourteen states have filed suit in an effort to stop the U.S. EPA from taking steps that will sacrifice senior citizens health in order to let the polluters escape clean-up requirements.

Further, these changes have been denounced by former administrator Carol Browner, who has said, “[t]he current Administration’s recent announcement of final and proposed changes to the New Source Review Program abandons the promise of the Clean Air Act - steady air quality improvements . . . There is no guarantee, and more importantly, no evidence or disclosure demonstrating that the Administration’s announced final or proposed changes will make the air cleaner. In fact they will allow the air to become dirtier.”<sup>9</sup>

The EPA is not just using regulatory proceedings to weaken clean air rules. It is also waging a legislative campaign to gut the Clean Air Act itself. The Bush administration’s so-called “Clear Skies” air pollution plan would allow power plants to emit more of the smog- and soot-forming pollution, as well as mercury, over a longer period of time than permitted under current law.<sup>10</sup>

- The Bush administration’s air pollution plan allows more than twice as much SO<sub>2</sub> for nearly a decade longer (2010-2018), compared to faithful enforcement of the current Clean Air Act. After 2018, SO<sub>2</sub> emissions will still be one and a half times higher than if current law is enforced;
- The Bush administration’s air pollution plan allows more than one and a half times as much NO<sub>x</sub> for nearly a decade longer (2010-2018), and one third more NO<sub>x</sub> even after 2018;
- In addition, the President’s plan allows power plants to emit five times as much mercury for a decade longer (2010-2018), and three times as much after 2018, compared to what could be controlled under current law, and unlimited levels of carbon dioxide, the leading causes of global warming.

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In part, the way that the administration justifies undermining clean air protections for seniors is by discounting the value of senior citizen lives. The EPA has estimated the benefits of its air pollution plan by estimating the lives of an American 65 years of age or older to only be worth 63% that of a younger American.<sup>11</sup>

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<sup>7</sup> Morbidity & Mortality: 2002 Chart Book on Cardiovascular Lung, and Blood Diseases, National Institutes of Health, National Heart, Lung, and Blood Institute, May 2002.

<sup>8</sup> STAPPA/ALAPCO Press Release on EPA’s New Source Review Reforms (November 22, 2002)

<sup>9</sup> Testimony of Health, Education, Labor and Pensions Subcommittee on public Health Hearing on “Staying Healthy: Human Health and Changes to the Clean air Act” Tuesday, September 3, 2002.

<sup>10</sup> Comparison of caps in Administration’s Clear Skies proposal available at [www.epa.gov](http://www.epa.gov), with estimates of business as usual Clean Air Act implementation as described by EPA on September 18, 2001 in a meeting with the Edison Electric Institute.

<sup>11</sup> EPA, Technical Addendum: Methodologies for the Benefit Analysis of the Clear Skies Initiative available at [http://www.epa.gov/airskies/tech\\_adden.pdf](http://www.epa.gov/airskies/tech_adden.pdf)

This is plainly unacceptable. The EPA should be looking to strengthen, not weaken, air-pollution protections for senior citizens. I urge the EPA to drop its proposed weakening changes to the NSR rules, publicly renounce its support of the president's air pollution plan, and reverse its practice of devaluing the lives of seniors. To show its full commitment to protecting seniors, we call on the EPA to:

1. Drop its use of the 37% lesser value for senior citizens in the cost-benefit analysis for the administration's non-road proposed diesel rule, Clear Skies, and all future regulations and send a letter to the Senate Environment and Public Works committee correcting EPA testimony that cited the benefits of Clear Skies using this analysis; and
2. Drop the entire alternative analysis EPA is using in its cost-benefit analysis for regulations, not simply the death discount, and value human lives to the fullest extent. At the very least, the administration needs to start allocating value to the benefits that result from reducing cancer and other long-term effects of air pollution. The current EPA cost-benefit analysis currently gives no value to these benefits.

Thank you.

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